

Jose Torres
J-2020-03855
Essex County Jail
354 Doremus Avenue
Newark, NJ 07105

CLERK
U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY

2023 FEB 27 P 1:19

February 26, 2023

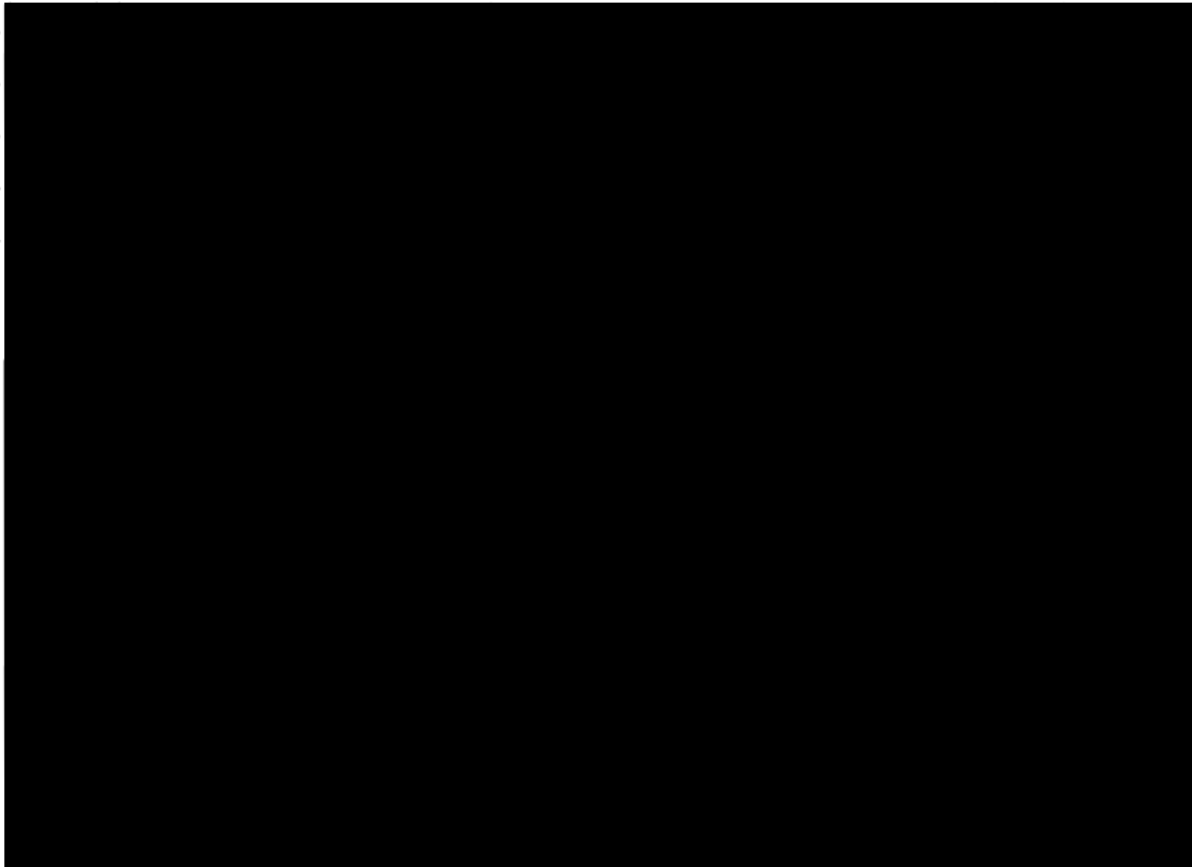
Honorable Judge Martinotti, U.S.D.J.
50 Walnut Street
Newark, NJ 07102

Case No. 20-418 (BRM)

Re: Torres' Motions Submitted to the Court - 24 in total

Dear Judge Martinotti,

I have enclosed 24 motions with this letter. The list of motions are outlined below with the number of pages, including cover page.



D. 2/26/23

7. **Response to District Court's Opinion re: In Limine Motions** – total pages, 17

8. **Due process violation** – motion for reconsideration; total pages 11



11. **The Government should review the personnel files of law enforcement officers who participated in Torres' investigation and disclose any and all information that might be useful to the defendant** – total pages, 3

12. **Motion prohibiting the use of the term 'victim' to reference the prostitutes / escorts** – total pages, 3

13. **Motion requesting the Court for internet access** – total pages, 2

14. **The disclosure of all favorable information to the defendant is required pursuant to Brady v. Maryland** – total pages, 3

15. **Motion to vacate the protective order** – total pages, 2

16. **Motion requesting the Court to require the Government to make available to the defense early disclosure of the Jencks Act Material of Government witnesses, and order that all rough notes, recordings and videos of interviews, and draft 302 reports be provided to the Defense within 45 days prior to trial** – total pages, 5

17. **Motion to sequester all witnesses prior to the opening statement...** – total pages, 3

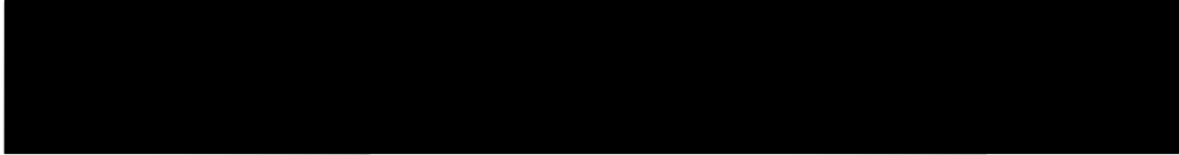
18. **Torres will not stipulate to any elements of the alleged offense** – total pages, 2

19. **Torres' participation on all sidebar conferences** – total pages, 2

20. **Daily transcripts or transcripts on a witness by witness basis** – total pages, 3

C/f 2/26/23

21. **Letter motion to AUSA Spiro regarding Attorney General Policy mandate, dated December 16, 2022** – total pages, 2
22. **Permission to file additional motions as they become necessary** – total pages, 2
23. **Defendants reply to Government response re: Pro se representation** – total pages, 5



Respectfully Submitted,

A handwritten signature in cursive script.

Jose O. Torres

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